

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

LAW OFFICES OF LEE M. PERLMAN
1926 GREENTREE ROAD, SUITE 100
CHERRY HILL, NJ 08003
TEL: (856)751-4224
FAX: (888)635-5933
Lee M. Perlman, Esq. (ID# 019171994)
Attorney for Debtor

In Re:
LOREN K. ROBINSON,
Debtor.

Case No.: 19-25547-MBK
Judge: Michael B. Kaplan
Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. Motion for Relief from the Automatic Stay filed by Specialized Loan Servicing,LLC, creditor,

A hearing has been scheduled for March 25, 2020, at 9:00 a.m..

Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

Certification of Default filed by _____,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

Payments have not been made for the following reasons and debtor proposes

repayment as follows (explain your answer):

Due to unexpected and unforeseen expenses, I fell behind with my post-petition mortgage payments. I am proposing to pay the full arrears of \$19,131.02 no later than March 20, 2020. Specifically, \$16,000.00 will be paid on March 18, 2020, with the remaining arrears being paid on March 20, 2020. I will submit all proofs of payment to my Counsel no later than March 20, 2020.

Other (explain your answer):

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: March 13, 2020


Karen K. Robinson
Debtor's Signature

Date: _____

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.